

# **Exhibit A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

PFLAG, INC., et al.,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, et al.,

*Defendants.*

Civil Action No. BAH-25-337

**DECLARATION OF OMAR GONZALEZ-PAGAN IN SUPPORT OF PLAINTIFFS’  
EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER**

I, Omar Gonzalez-Pagan, hereby declare and state:

1. I am over 18 years of age, of sound mind, and fully capable of making this declaration. I have personal knowledge of the facts set forth in this declaration, they are true and correct, and I would be able to testify about these facts if I were called as a witness at a hearing or trial.

2. I am a licensed attorney in the Commonwealth of Massachusetts and the State of New York. I am Senior Counsel and Health Care Strategist at Lambda Legal, and counsel for Plaintiffs in this action.

3. I submit this declaration in support of Plaintiffs’ Emergency Motion for a Temporary Restraining Order.

4. On January 31, 2025, Defendant Health Resources & Services Administration (“HRSA”) transmitted via email a notice to recipients of HRSA grants, instructing them to comply with the executive orders at issue. **Exhibit A-1** is a true and correct copy of that email notice.

5. On January 30, 2025, Children's National Hospital issued a statement announcing that it is pausing care in compliance with the executive orders at issue. *See Children's National Hospital Statement on Executive Order* (Jan. 30, 2025), <https://www.childrensnational.org/about-us/newsroom/2025/statement-on-executive-order>. **Exhibit A-2** is a true and correct copy of that statement.

6. On or about January 30, 2025, Children's Hospital of Richmond at VCU issued a statement on its website announcing that it is pausing care in compliance with the executive orders at issue. *See Transgender, Children's Hosp. of Richmond at VCU* (Feb. 1, 2025), <https://www.chrichmond.org/services/transgender/>. **Exhibit A-3** is a true and correct copy of that statement.

7. On or about January 30, 2025, UVA Health issued a statement on its website announcing that it is pausing care in compliance with the executive orders at issue. *See Gender Health Services Impacted by Executive Order*, UVA Health, <https://childrens.uvahealth.com/services/transgender-youth-health> (last visited Feb. 1, 2025). **Exhibit A-4** is a true and correct copy of that statement.

8. On or about January 30, 2025, Denver Health issued a statement on its website announcing that it is pausing care in compliance with the executive orders at issue. *See Denver Health responds to executive order regarding gender-affirming care*, Denver Health (Jan. 30, 2025), <https://www.denverhealth.org/news/2025/01/denver-health-responds-to-executive-order-regarding-gender-affirming-care>. **Exhibit A-5** is a true and correct copy of that statement.

9. On January 30, 2025, Jason Miyares, Attorney General of the Commonwealth of Virginia, transmitted a letter to the University of Virginia and Virginia Commonwealth University

directing them to comply with the executive orders at issue. **Exhibit A-6** is a true and correct copy of that letter.

10. On February 3, 2025, the White House issued a News Release entitled, *President Trump is Delivering on His Commitment to Protect Our Kids*, touting that the executive orders at issue are “already having [their] intended effect.” **Exhibit A-7** is a true and correct copy of that News Release.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 5th day of February, 2025.

/s/ Omar Gonzalez-Pagan  
Omar Gonzalez-Pagan